

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**CANDICE PASCHAL and PEDRO
ZARAZUA JR., individually and on
behalf of all others similarly situated
under 29 U.S.C. § 216(b)**

Plaintiffs,

v.

**PERRY’S RESTAURANTS LTD d/b/a
Perry’s Steakhouse and Grille; and
CHRISTOPHER V. PERRY,
individually**

Defendants.

No. 1:22-cv-00027-RP

**JOINT MOTION TO APPROVE
FLSA NOTICE FORMS**

CANDICE PASCHAL and PEDRO ZARAZUA JR., individually and on behalf of all others similarly situated under 29 U.S.C. § 216(b) (“Plaintiffs”) and PERRY’S RESTAURANTS LTD d/b/a Perry’s Steakhouse and Grille; and CHRISTOPHER V. PERRY, individually (“Defendants”) file this Joint Motion to Approve FLSA Notice Forms pursuant to the Court’s Order, [Dkt. 87].

1. On May 16, 2020, the Court Ordered the parties to submit joint revised notices that conform to Judge Hightower’s report and recommendation, [Dkt. 78].

2. Pursuant to the Court’s Order, the Parties submit the following revised notice forms for the Court’s approval:

- a. Notice and Consent Form, *attached as Exhibit 1*
- b. Email and Text Message Notice, *attached as Exhibit 2*
- c. Reminder Notice, *attached as Exhibit 3.*

* * *

PRAYER

Accordingly, the Parties respectfully request the Court approve the attached notice forms and order that notice be distributed in accordance with the schedule set forth the proposed order submitted herewith.

Respectfully jointly submitted,

By: /s/ Drew N. Herrmann

Drew N. Herrmann
Texas Bar No. 24086523
drew@herrmannlaw.com
Pamela G. Herrmann
Texas Bar No. 24104030
pamela@herrmannlaw.com
HERRMANN LAW, PLLC
801 Cherry St., Suite 2365
Fort Worth, TX 76102
Phone: 817-479-9229
Fax: 817-840-5102

Harold L. Lichten,
Admitted pro hac vice
hlichten@llrlaw.com
Matthew Thomson,
Admitted pro hac vice
mthomson@llrlaw.com
Jane Farrell,
Admitted pro hac vice
jfarrell@llrlaw.com
LICHTEN & LISS-RIORDAN, P.C.
729 Boylston St., Suite 2000
Boston, MA 02116
Phone: (617) 994-5800

ATTORNEYS FOR PLAINTIFFS
AND COLLECTIVE MEMBERS

By: /s/ Scott M. McElhaney (with permission)

Lionel M. Schooler
Texas Bar No. 17803300
Brooke Willard
Texas Bar No. 24109466
JACKSON WALKER LLP
1401 McKinney Ave., Suite 1900
Houston, Texas 77010
Phone: (713) 752-4516
Fax: (713) 308-4156
Email: lschooler@jw.com
Email: bwillard@jw.com

Matt Dow
Texas Bar No. 06066500
JACKSON WALKER LLP
100 Congress Street, Suite 1100
Austin, Texas 78701
Phone: 512-236-2230
Email: mdow@jw.com

Scott M. McElhaney
Texas Bar No. 00784555
JACKSON WALKER LLP
2323 Ross Avenue, Suite 600
Dallas, Texas 75201
Phone: 214-953-6000
Fax: 214-953-5822
Email: smcelhaney@jw.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that on May 30, 2023 the above document will be filed via CM/ECF, which will cause a copy to be served on all counsel of record.

/s/ Drew N. Herrmann

Drew N. Herrmann